

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Marvin Fleming, et al. v. National Football
League, et al.

Court File No. 2:13-cv-00051-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS DONALD
WESTBROOK, JR. AND
ALFREDA WESTBROOK**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Donald Westbrook, Jr. and Alfreda Westbrook only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Marvin Fleming, et al. v. National Football League, et al.*, No. 12-cv-09270, in the Southern District of New York on December 19, 2012 and it was transferred and assigned Court File No. 2:13-cv-00051-AB, in the Eastern District of Pennsylvania on January 4, 2013, for the benefit of several retired National Football League players, including Donald Westbrook, Jr. and Alfreda Westbrook.

2. Plaintiffs' counsel filed a short form complaint for Donald Westbrook, Jr. and Alfreda Westbrook on January 10, 2013.

3. Since then, irreconcilable differences have arisen between Plaintiffs Donald Westbrook, Jr. and Alfreda Westbrook and the undersigned.

4. Plaintiffs' counsel properly notified Donald Westbrook, Jr. and Alfreda Westbrook of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Donald Westbrook, Jr. and Alfreda Westbrook only in Court File No. 13-cv-00051-AB.

Dated: November 17, 2016

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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J. Gordon Rudd, Jr. (#222082)

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